
DARE INVESTMENTS, LLC, a Utah
limited liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE
COMPANY, a Missouri domiciled
insurer; HORIZON TITLE AGENCY,
Inc., a New Jersey domiciled company;
CHICAGO TITLE RICO
ENTERPRISE, a racketeering
enterprise,

Defendants.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Civil Action No. 2:10-cv-06088-DRD-MAS

**[PROPOSED] ORDER FOR WAIVER OF
PRE-DENIAL ATTORNEY-CLIENT
COMMUNICATIONS**

Upon Stipulation of the Parties on December 19, 2011, in open Court before the
Honorable Magistrate Judge Michael A. Shipp,

IT IS HEREBY ORDERED that:

1. Any claims of attorney-client privilege applicable to the communications
between Plaintiff Dare Investments LLC and its counsel (including but not limited to
the law firms of Jones Waldo and LeClair Ryan, formerly known as St. John & Wayne
and Seiden Wayne) prior to August 14, 2007 is hereby waived by Plaintiff;

2. Plaintiff is hereby ordered to produce to Defendant Chicago Title
Insurance Company all communications between Plaintiff and its counsel prior to
August 14, 2007, except for those communications, if any, that are claimed to be work
product privileged or privileged in some respect other than attorney-client privileged, in

which case Plaintiff shall produce a privilege log for such withheld documents or communications;

3. The documents and communications between Plaintiff and its counsel prior to August 14, 2007 are relevant and material to Plaintiff's claims in this action and Defendant's defenses thereto, but the Court has not determined admissibility of such documents and communications for trial at this time and the parties reserve their rights regarding same;

4. A copy of this Order shall be served upon all answering parties of record via the ECF system.

IT IS SO ORDERED this ____ day of _____, 2011.

The Honorable Michael A. Shipp, U.S.M.J.